

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**NOTICE OF *AMENDED*² AGENDA OF MATTERS SCHEDULED FOR HEARING
ON DECEMBER 11, 2023 AT 2:00 P.M. (ET)**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND REQUIRES
ALL PARTICIPANTS TO REGISTER IN ADVANCE. COURTCALL WILL NOT BE USED TO
DIAL IN. PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:**

https://debuscourts.zoomgov.com/meeting/register/vJlsf-2vqTwoHm4Gg5tFKAFVG34PWt_cqII

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

I. ADJOURNED/RESOLVED MATTERS:

1. Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to Class Claims [[Docket No. 668](#) – filed November 6, 2023]

Response/Objection Deadline: November 14, 2023 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Debtors' Objection to Ohio Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to Class Claims [[Docket No. 696](#) – filed November 14, 2023]
- B. Objection of the Official Committee of Equity Security Holders to the Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to Class Claims [[Docket No. 699](#) – filed November 14, 2023]

Related Documents:

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Amended items appear in bold.

- i. Declaration of James Lee in Support of Debtors' Objection to Ohio Lead Plaintiff's Motion to Apply Bankruptcy Rule 7023 to Class Claims [[Docket No. 697](#) – filed November 14, 2023]

Status: The hearing on this matter has been adjourned to the omnibus hearing scheduled for December 19, 2023 at 2:00 p.m. (ET).

2. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Settle Claims Under Certain Employment Agreements and (II) Granting Related Relief [[Docket No. 690](#) – filed November 13, 2023]

Response/Objection Deadline: November 27, 2023 at 4:00 p.m. (ET)

Responses/Objections Received: None.

Related Documents:

- i. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Settle Claims Under Certain Employment Agreements and (II) Granting Related Relief [[Docket No. 754](#) – filed November 28, 2023]
- ii. Order (I) Authorizing the Debtors to Settle Claims Under Certain Employment Agreements and (II) Granting Related Relief [[Docket No. 759](#) – entered November 29, 2023]

Status: On November 29, 2023, the Court entered an order resolving this matter. Accordingly, a hearing on this matter is no longer required.

3. Debtors' First Omnibus (Non-Substantive) Objection to Certain (I) Duplicate Claims, (II) Insufficient Documentation Claims, (III) Incorrect Debtor Claims and (IV) Late-Filed Claims [[Docket No. 687](#) – filed November 10, 2023]

Response/Objection Deadline: November 27, 2023 at 4:00 p.m. (ET)

Responses/Objections Received:

- A. Informal comments from Meta Systems
- B. Objection of Fiberdyne Research Pty Ltd to Debtors' First Omnibus (Non-Substantive) Objection to Certain (I) Duplicate Claims, (II) Insufficient Documentation Claims, (III) Incorrect Debtor Claims and (IV) Late-Filed Claims [[Docket No. 778](#) – filed December 4, 2023]

Related Documents:

- i. Notice of Submission of Proofs of Claim in Connection with Debtors' First

Omnibus (Non-Substantive) Objection to Certain (I) Duplicate Claims, (II) Insufficient Documentation Claims, (III) Incorrect Debtor Claims and (IV) Late-Filed Claims [[Docket No. 741](#) – filed November 27, 2023]

- ii. Certification of Counsel Regarding Debtors' First Omnibus (Non-Substantive) Objection to Certain (I) Duplicate Claims, (II) Insufficient Documentation Claims, (III) Incorrect Debtor Claims and (IV) Late-Filed Claims [[Docket No. 771](#) – filed December 5, 2023]
- iii. Order Sustaining Debtors' First Omnibus (Non-Substantive) Objection to Certain (I) Duplicate Claims, (II) Insufficient Documentation Claims, (III) Incorrect Debtor Claims and (IV) Late-Filed Claims [[Docket No. 772](#) – entered December 5, 2023]

Status: On December 5, 2023, the Court entered an order resolving this matter. Accordingly, a hearing on this matter is no longer required.

II. MATTER UNDER CERTIFICATION:

- 4. Debtors' Motion for Entry of an Order (I) Authorizing, But Not Directing, the Debtors to Repurchase Endurance Trucks from Customers, and (II) Granting Related Relief [[Docket No. 731](#) – filed November 22, 2023]

Response/Objection Deadline: December 5, 2023 at 4:00 p.m. (ET)

Responses/Objections Received:

Related Documents:

- i. Order Shortening Notice and Objection Periods for Debtors' Motion for Entry of an Order (I) Authorizing, But Not Directing, the Debtors to Repurchase Endurance Trucks from Customers, and (II) Granting Related Relief [[Docket No. 738](#) – entered November 27, 2023]
- ii. Notice of Hearing Regarding Debtors' Motion for Entry of an Order (I) Authorizing, but not Directing, the Debtors to Repurchase Endurance Trucks from Customers, and (II) Granting Related Relief [[Docket No. 740](#) – filed November 27, 2023]
- iii. Certificate of No Objection Regarding Debtors' Motion for Entry of an Order (I) Authorizing, But Not Directing, the Debtors to Repurchase Endurance Trucks from Customers, and (II) Granting Related Relief [[Docket No. 785](#) - filed December 6, 2023]
- iv. **Order (I) Authorizing, But Not Directing, the Debtors to Repurchase Endurance Trucks from Customers, and (II) Granting Related Relief [[Docket No. 790](#) – entered December 7, 2023]**

Status: On December 7, 2023, the Court entered an order resolving this matter. Accordingly, a hearing on this matter is no longer required.

III. INTERIM FEE APPLICATIONS:

5. First Interim Fee Applications

Responses/Objections: December 4, 2023 at 4:00 p.m. (ET)

Related Documents:

- i. See Exhibit A
- ii. Certification of Counsel with Respect to First Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses [[Docket No. 788](#) - filed December 7, 2023]

Status: A hearing on this matter will go forward.

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Dated: December 8, 2023
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u></p> <p>WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**INDEX FOR FIRST INTERIM FEE APPLICATIONS TO BE CONSIDERED AT THE
DECEMBER 11, 2023 AT 2:00 P.M. (ET) OMNIBUS HEARING**

1. First Interim Application of White & Case LLP for Allowance of Compensation and Reimbursement of Expenses for the Period June 27, 2023 to September 30, 2023 [Docket No. 692 – filed November 14, 2023]

Objection Deadline: December 4, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. First Monthly Application of White & Case for Allowance of Compensation and Reimbursement of Expenses for the Period from June 27, 2023 to and Including July 31, 2023 [Docket No. 422 – filed September 13, 2023]
- B. Certification of No Objection Regarding First Monthly Application of White & Case for Allowance of Compensation and Reimbursement of Expenses for the Period from June 27, 2023 to and Including July 31, 2023 [Docket No. 516 – filed October 4, 2023]
- C. Second Monthly Application of White & Case LLP for Allowance of Compensation and Reimbursement of Expenses for the Period from August 1, 2023 to and Including August 31, 2023 [Docket No. 594 – filed October 20, 2023]
- D. Certificate of No Objection Regarding Second Monthly Application of White & Case LLP for Allowance of Compensation and Reimbursement of Expenses for the Period from August 1, 2023 to and Including August 31, 2023 [Docket No. 685 – filed November 10, 2023]

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

- E. Third Monthly Application of White & Case LLP for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2023 to and Including September 30, 2023 [Docket No. 684 – filed November 10, 2023]
 - F. Certificate of No Objection Regarding Third Monthly Application of White & Case LLP for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2023 to and Including September 30, 2023 [Docket No. 763 – filed December 1, 2023]
2. First Interim Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the Period June 27, 2023 to September 30, 2023 [Docket No. 693 – filed November 14, 2023]

Objection Deadline: December 4, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. First Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the Period from June 27, 2023 Through and Including July 31, 2023 [Docket No. 359 – filed September 1, 2023]
- B. Certificate of No Objection Regarding First Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the Period from June 27, 2023 Through and Including July 31, 2023 [Docket No. 465 – filed September 22, 2023]
- C. Second Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the Period from August 1, 2023 Through and Including August 31, 2023 [Docket No. 474 – filed September 26, 2023]
- D. Certificate of No Objection Regarding Second Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the Period from August 1, 2023 Through and Including August 31, 2023 [Docket No. 674 – filed November 8, 2023]
- E. Third Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the Period from September , 2023 Through and Including September 30, 2023 [Docket No. 648 – filed October 31, 2023]
- F. Certificate of No Objection Regarding Third Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the Period from September 1, 2023 Through and Including September 30, 2023

[Docket No. 724 – filed November 21, 2023]

3. First Interim Application of Silverman Consulting for Allowance of Compensation and Reimbursement of Expenses for the Period June 27, 2023 to September 30, 2023 [Docket No. 694 – filed November 14, 2023]

Objection Deadline: December 4, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. First Monthly Application of Silverman Consulting for Allowance of Compensation and Reimbursement of Expenses for the Period from June 27, 2023 to and Including July 31, 2023 [Docket No. 291 – filed August 22, 2023]
 - B. Certificate of No Objection Regarding First Monthly Application of Silverman Consulting for Allowance of Compensation and Reimbursement of Expenses for the Period from June 27, 2023 to and Including July 31, 2023 [Docket No. 419 – filed September 12, 2023]
 - C. Second Monthly Application of Silverman Consulting for Allowance of Compensation and Reimbursement of Expenses for the Period from August 1, 2023 to and Including August 31, 2023 [Docket No. 468 – filed September 25, 2023]
 - D. Certificate of No Objection Regarding Second Monthly Application of Silverman Consulting for Allowance of Compensation and Reimbursement of Expenses for the Period from August 1, 2023 to and Including August 31, 2023 [Docket No. 584 – filed October 18, 2023]
 - E. Third Monthly Application of Silverman Consulting for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2023 to and Including September 30, 2023 [Docket No. 616 – filed October 25, 2023]
 - F. Certificate of No Objection Regarding Third Monthly Application of Silverman Consulting for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2023 to and Including September 30, 2023 [Docket No. 708 – filed November 15, 2023]
4. First Interim Application Request of KPMG LLP for the Period June 27, 2023 to September 30, 2023 [Docket No. 695 – filed November 14, 2023]

Objection Deadline: December 4, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. First Combined Monthly Application of KPMG LLP Providing Audit Services to the Debtors Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period June 27, 2023 Through August 31, 2023 [Docket No. 457 – filed September 20, 2023]
 - B. Certificate of No Objection Regarding First Combined Monthly Application of KPMG LLP Providing Audit Services to the Debtors Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period June 27, 2023 Through August 31, 2023 [Docket No. 585 – filed October 18, 2023]
 - C. Second Monthly Application of KPMG LLP Providing Audit Services to the Debtors Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period September 1, 2023 Through September 30, 2023 [Docket No. 604 – filed October 23, 2023]
 - D. Certificate of No Objection Regarding Second Monthly Application of KPMG LLP Providing Audit Services to the Debtors Requesting Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period September 1, 2023 Through September 30, 2023 [Docket No. 701 – filed November 14, 2023]
5. First Interim Application of Winston & Strawn LLP for Allowance of Compensation and Reimbursement of Expenses for the Period August 15, 2023 to September 30, 2023 [Docket No. 700 -filed November 14, 2023]

Objection Deadline: December 4, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents: None.

6. First Interim Application of Jefferies LLC as Investment Banker for the Debtors and Debtors in Possession for Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period June 27, 2023 to September 30, 2023 [Docket No. 703 – filed November 14, 2023]

Objection Deadline: December 4, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. First Consolidated Monthly Application of Jefferies LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker for the Debtors and Debtors in Possession for the Period from June 27, 2023 to and Including September 30, 2023 [Docket No. 702 – filed November 14, 2023]
- 7. First Interim Application of Baker & Hostetler LLP for Allowance of Compensation and Reimbursement of Expenses for the Period June 27, 2023 to September 30, 2023 [Docket No. 704 – filed November 14, 2023]

Objection Deadline: December 4, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. First Monthly Fee Application of Baker & Hostetler LLP, as Special Litigation and Corporate Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period June 27, 2023 Through July 31, 2023 [Docket No. 533 – filed October 9, 2023]
- B. Certificate of No Objection Regarding First Monthly Fee Application of Baker & Hostetler LLP, as Special Litigation and Corporate Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period June 27, 2023 Through July 31, 2023 [Docket No. 649 – filed October 31, 2023]
- C. Second Monthly Fee Application of Baker & Hostetler LLP, as Special Litigation and Corporate Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period August 1, 2023 Through August 31, 2023 [Docket No. 659 – filed November 1, 2023]
- D. Certificate of No Objection Regarding Second Monthly Fee Application of Baker & Hostetler LLP, as Special Litigation and Corporate Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period August 1, 2023 Through August 31, 2023 [Docket No. 736 – filed November 22, 2023]
- E. Third Monthly Fee Application of Baker & Hostetler LLP, as Special Litigation and Corporate Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period September 1, 2023 Through September 30, 2023 [Docket No. 691 – filed November 14, 2023]
- F. Certificate of No Objection Regarding Third Monthly Fee Application of Baker & Hostetler LLP, as Special Litigation and Corporate Counsel for the Debtors, for Allowance of Compensation and Reimbursement of Expenses for the Period

September 1, 2023 Through September 30, 2023 [Docket No. 777 – filed December 6, 2023]

8. First Interim Application of Troutman Pepper Hamilton Sanders LLP, as Counsel for the Official Committee of Unsecured Creditors for the Period July 17, 2023 to September 30, 2023 [Docket No. 705 – filed November 14, 2023]

Objection Deadline: December 4, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. First Monthly Application of Troutman Pepper Hamilton Sanders LLP for Compensation for Services Rendered and Reimbursement of Expenses as Counsel for the Official Committee of Unsecured Creditors for the Period from July 17, 2023 Through and Including July 31, 2023 [Docket No 372 – filed September 6, 2023]
- B. Certificate of No Objection Regarding First Monthly Application of Troutman Pepper Hamilton Sanders LLP for Compensation for Services Rendered and Reimbursement of Expenses as Counsel for the Official Committee of Unsecured Creditors for the Period from July 17, 2023 Through and Including July 31, 2023 [Docket No 481 – filed September 27, 2023]
- C. Second Monthly Application of Troutman Pepper Hamilton Sanders LLP for Compensation for Services Rendered and Reimbursement of Expenses as Counsel for the Official Committee of Unsecured Creditors for the Period from August 1, 2023 Through and Including August 31, 2023 [Docket No 574 – filed October 17, 2023]
- D. Certificate of No Objection Regarding Second Monthly Application of Troutman Pepper Hamilton Sanders LLP for Compensation for Services Rendered and Reimbursement of Expenses as Counsel for the Official Committee of Unsecured Creditors for the Period from August 1, 2023 Through and Including August 31, 2023 [Docket No 671 – filed November 7, 2023]
- E. Third Monthly Application of Troutman Pepper Hamilton Sanders LLP for Compensation for Services Rendered and Reimbursement of Expenses as Counsel for the Official Committee of Unsecured Creditors for the Period from September 1, 2023 Through and Including September 30, 2023 [Docket No 698 – filed November 14, 2023]
- F. Certificate of No Objection Regarding Third Monthly Application of Troutman Pepper Hamilton Sanders LLP for Compensation for Services Rendered and Reimbursement of Expenses as Counsel for the Official Committee of Unsecured Creditors for the Period from September 1, 2023 Through and Including

September 30, 2023 [Docket No. 773 – filed December 5, 2023]

9. First Interim Fee Application of Huron Consulting Group., Inc., Financial Advisor to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period July 20, 2023 to September 30, 2023 [Docket No. 706 – filed November 14, 2023]

Objection Deadline: December 4, 2023 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- A. First Monthly Staffing and Compensation Report of Huron Consulting Services LLC for the Period from July 21, 2023 Through August 31, 2023 [Docket No. 496 – filed October 2, 2023]
- B. Certificate of No Objection Regarding Monthly Staffing and Compensation Report of Huron Consulting Services LLC for the Period from July 21, 2023 Through August 31, 2023 [Docket No. 609 – filed October 24, 2023]
- C. Second Monthly Staffing and Compensation Report of Huron Consulting Services LLC for the Period from September 1, 2023 Through September 30, 2023 [Docket No. 664 – filed November 3, 2023]
- D. Certificate of No Objection Regarding Second Monthly Staffing and Compensation Report of Huron Consulting Services LLC for the Period from September 1, 2023 Through September 30, 2023 [Docket No. 750 – filed November 28, 2023]